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Alameda County and Alameda County
Board of Supervisors

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

JOHN WILLIAMS, ROBERT
VOGEL, SHEANNA ROGERS,
MICHAEL LOEB, JAQUELINE
WATSON-BAKER, and HOUSING
PROVIDERS OF AMERICA,

Plaintiffs and
Petitioners,

v.

ALAMEDA COUNTY, ALAMEDA
COUNTY BOARD OF
SUPERVISORS, CITY OF
OAKLAND, OAKLAND CITY
COUNCIL, and DOES 1-10,

Defendants and
Respondents,

v.

ALLIANCE OF CALIFORNIANS
FOR COMMUNITY
EMPOWERMENT ACTION,

Defendant-Intervenor

Case No. 3:22-cv-01274-LB

**STIPULATION TO INCREASE
PAGE LIMIT; ~~[PROPOSED]~~
ORDER**

Hon. Laurel Beeler

Trial Date: none set

1 WHEREAS, on March 1, 2022, in *Williams v. County of Alameda*, N.D. Cal.
2 Case No. 3:22-cv-01274-LB, Plaintiffs John Williams, Robert Vogel, Sheanna
3 Rogers, Michael Loeb, Jaqueline Watson-Baker, and Housing Providers of America
4 (together, “Williams Plaintiffs”) filed a Complaint for Damages and Petition for
5 Writ and Request for Immediate Stay against Defendants Alameda County,
6 Alameda County Board of Supervisors (together, the “County”), City of Oakland,
7 and Oakland City Council;

8 WHEREAS, on May 5, 2022, in *California Apartment Association v. County of*
9 *Alameda*, N.D. Cal. Case No. 3:22-cv-02705-LB (“CAA”), Plaintiffs California
10 Apartment Association, Stephen Lin, Rakesh and Tripti Jain, Alison Mitchell,
11 Michael Hagerty, and H. Alex and Dannie Alvarez (together, “CAA Plaintiffs”) filed
12 a Complaint for Damages, Injunctive, and Declaratory Relief and Petition for Writ
13 of Mandate against the County;

14 WHEREAS, on April 27, 2022, Intervenor-Defendant Alliance of Californians
15 for Community Empowerment Action (“ACCE”) and the parties in *Williams*
16 stipulated to ACCE’s intervention in *Williams*;

17 WHEREAS, on April 28, 2022, the Court entered an order granting ACCE’s
18 intervention in *Williams*;

19 WHEREAS, on May 17, 2022, the Court entered an order relating *Williams*
20 and CAA;

21 WHEREAS, on July 18, 2022, the Williams Plaintiffs filed a motion for
22 partial summary judgment;

23 WHEREAS, on July 18, 2022, the CAA Plaintiffs filed a motion for partial
24 summary judgment;

25 WHEREAS, both motions rely on a similar factual background and raise
26 overlapping claims against the County;

27 WHEREAS, because of the significantly overlapping issues in the two
28 motions for summary judgment, it is in the interest of convenience of both the

parties and the Court that the County file a single brief in opposition to both motions; and

WHEREAS, responding to both motions in the same brief will require more pages than the 25-page limit established by Civil Local Rules 7-3(a) and 7-4(b).

IT IS THEREFORE STIPULATED by and among the parties that:

1. The County may file in both cases a single, consolidated opposition responding to both the Williams and CAA Plaintiffs' summary judgment motions instead of two distinct oppositions.

2. The County's consolidated opposition shall not exceed 40 pages of text.

3. The parties request that the Court enter the attached order accordingly.

4. This stipulation may be executed in counterparts.

DATED: August 26, 2022

SHUTE, MIHALY & WEINBERGER LLP

By: /s/Matthew D. Zinn

MATTHEW D. ZINN
EDWARD T. SCHEXNAYDER
MINDY K. JIAN

Attorneys for Defendants and Respondents
Alameda County and Alameda County
Board of Supervisors

DATED: August 26, 2022

BARBARA J. PARKER, CITY ATTORNEY

By: /s/Cynthia F. Stein

CYNTHIA F. STEIN
Deputy City Attorney

Attorneys for Defendants and Respondents
City of Oakland and Oakland City Council

1 DATED: August 26, 2022

SUSMAN GODFREY LLP

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3 By: /s/Nicholas N. Spear

4 MARC SELTZER

KRYSTA K. PACHMAN

5 GLENN C. BRIDGMAN

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7 Attorneys for Intervenor-Defendant

8 Alliance of Californians for Community

9 Empowerment Action

10 DATED: August 26, 2022

ZACKS, FREEDMAN & PATTERSON, PC

11
12 By: /s/Emily L. Brough

13 ANDREW M. ZACKS

14 EMILY L. BROUGH

15 Attorneys for Plaintiffs and Petitioners

16 John Williams, Robert Vogel, Sheanna

17 Rogers, Michael Loeb, Jacqueline Watson-

18 Baker, and Housing Providers of America

19 I hereby attest that I have on file all holographic signatures corresponding to
20 any signatures indicated by a conformed signature (/s/) within this e-filed document.

21 DATED August 26, 2022

22 /s/Matthew D. Zinn

~~[PROPOSED]~~ ORDER

The parties having met and conferred and entered the foregoing Stipulation, which the Court has reviewed, and good cause appearing, the County's opposition to the pending motion for partial summary judgment shall not exceed 40 pages of text.

IT IS SO ORDERED.

DATED: August 29, 2022



HONORABLE LAUREL BEELER
United States Magistrate Judge